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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**
9

10 UNITED STATES OF AMERICA,) **2:12-CR-0395-PMP-GWF**
11 Plaintiff,)
12 vs.) **STIPULATION FOR PROTECTIVE ORDER**
13 EDWARD LIU,)
14 Defendants.)
15

16 **IT IS HEREBY STIPULATED AND AGREED** between the parties, DANIEL G.
17 BOGDEN, United States Attorney for the District of Nevada, and KIMBERLY M. FRAYN,
18 Assistant United States Attorney, counsel for the United States, and R. DARREN CORNFORTH,
19 ESQ., counsel for defendant EDWARD LIU, that this Court issue an Order protecting from
20 disclosure to the public any discovery documents containing the personal identifying information
21 and financial identifying information of participants, witnesses and victims in this case. Such
22 documents shall be referred to hereinafter as “Protected Documents.” The parties state as follows:

23 1. “Protected Documents” are any documents containing the personal identifying
24 information and financial identifying information, such as, names, social security numbers,
25 drivers’ license numbers, dates of birth, addresses, debit card and credit card account numbers,
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1 financial lines of credit account numbers, bank account numbers, and Personal Identification
2 Numbers (PINs), of participants, witnesses and victims in this case.

3 2. Protected Documents will be used by the government in its case in chief in this
4 case.

5 3. Discovery in this case is voluminous and include many Protected Documents.
6 Redacting the personal identifying information and financial identifying information of
7 participants, witnesses, and victims would prevent the timely disclosure of discovery to
8 defendants.

9 4. The United States agrees to provide Protected Documents without redacting the the
10 personal identifying information and financial identifying information of participants, witnesses,
11 and victims.

12 5 Access to Protected Documents will be restricted to persons authorized by the
13 Court, namely defendant, attorney(s) of record and attorneys' paralegals, investigators, experts,
14 and secretaries employed by the attorney(s) of record and performing on behalf of defendant.

15 6. The following restrictions will be placed on defendant, defendant's attorney(s) and
16 the above-designated individuals, unless and until further ordered by the Court. Individuals with
17 authorized access to Protected Documents shall not:

18 a. make copies for, or allow copies of any kind to be made by any other person
19 of Protected Documents;

20 b. allow any other person to read Protected Documents; and

21 c. use Protected Documents for any other purpose other than preparing to
22 defend against the charges in the Indictment or any further superseding indictment arising out of
23 this case.

24 7. Defendant's attorney(s) shall inform any person to whom disclosure may be made
25 pursuant to this order of the existence and terms of this Court's order.

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1 8. The requested restrictions shall not restrict the use or introduction as evidence of
2 discovery documents containing the personal identifying information and financial identifying
3 information during the trial of this matter.

4 9. Upon conclusion of this action, defendant's attorney(s) shall return to government
5 counsel or destroy and certify to government counsel the destruction of all discovery documents
6 containing personal identifying information and financial identifying information within a
7 reasonable time, not to exceed thirty days after the last appeal is final.

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9 DANIEL G. BOGDEN
10 United States Attorney

11 /s/ Kimberly M. Frayn
12 KIMBERLY M. FRAYN
Assistant United States Attorney

November 15, 2012
DATE

13
14 /s/ R. Darren Cornforth
15 R. DARREN CORNFORTH
16 Counsel for defendant
EDWARD LIU

November 15, 2012
DATE

17
18 **ORDER**

19 IT IS SO ORDERED this 16th day of November 2012.

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22 UNITED STATES MAGISTRATE JUDGE